Comments Received on Draft "Using Upper Percentile Values within the Range of Typical Indoor Air Values at Residences and Schools"

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Starting with Next Steps

- MassDEP will issue a second draft for review and comment
- Comment summary and response (on first draft) will be issued along with 2nd draft
- Second draft and comment summary review period will overlap with Indoor Air SOP review



Draft UPV Document (1/23/08)

- At http://www.mass.gov/dep/cleanup/iawg.htm#upper
- Provides "Typical Indoor Air Concentrations" for 43 OHMs derived from measured values from selected studies
- Identifies Upper Percentile Values (UPVs) within ranges and provides guidance on use of UPVs in evaluating indoor air analytical results from disposal site investigations where there is concern about vapor intrusion



Comments

- Lines of Evidence Term Vague
- UPVs Relationship to 21E/MCP Background
- Approach Differs from Other Guidance
- Risk Management Criteria
- Development of UPVs
 - Studies used, percentiles, mean v. median
- Other

